through their counsel of record, as follows.

- (1) On July 3, 2007, the parties stipulated to a 60-day continuance of all dates in this matter pending settlement discussions, and on July 5, 2007, the Court entered its Order approving that stipulation.
- (2) The parties believed in early July that 60 days would be sufficient time to complete settlement discussions. Communications for that purpose have occurred during the past two months. The parties and their attorneys have agreed that it will be desirable to meet in San Francisco to discuss settlement face-to-face. However, due to the great distance between Indonesia and California, and the press of other business, the principals were not able to schedule a San Francisco meeting during either July or August.
- (3) The parties hope to schedule a San Francisco meeting during the month of September, with the continuing purpose of attempting to achieve an amicable settlement of this matter.
- (4) Therefore, the parties believe that all calendared events and any other actions to be taken in this case should be continued for an additional sixty days in order to allow the parties a continuing opportunity to fully explore whether they are able to resolve this matter. They believe that additional expenditure of attorney's fees and costs would not be conducive to this end.

  Accordingly, the parties respectfully request that this Court continue all dates calendared in this

## **CURRENT SCHEDULE OF EVENTS**

## PROPOSED SCHEDULE OF EVENTS

Last day for defendant to respond to plaintiff's complaint (9/10/07)

November 9, 2007

Last day to:

matter as follows.

\*Meet and Confer re initial disclosures, early settlement, ADR process selection, and discovery plan (9/11/07)
STIPULATION RE CONTINUANCE OF

DATES AND [PROPOSED] ORDER

Case No. C 07 2340 JSW

November 13, 2007

## 1 \* File Joint ADR Certification with 2 Stipulation to ADR Process or Notice of Need November 13, 2007 for ADR Phone Conference (9/11/07) 3 4 Last day to file Rule 26(f) Report, complete initial disclosures or state objection in 5 Rule 26(f) Report and file Case Management November 26, 2007 Statement per Standing Order re Contents of 6 Joint Case Management Statement (9/25/07) 7 Initial Case Management Conference (10/5/07, December 7, 2007, at 1:30 p.m. 1:30 p.m.) 8 9 IT IS SO STIPULATED. 10 Concurrence in filing this document was obtained from Sandra S. Kearney, defendant's 11 12 counsel, in compliance with General Order Number 45, Section X. 13 14 Dated: August 31, 2007. FARELLA BRAUN & MARTEL LLP 15 16 By: /s/\_ Sandra A. Kearney 17 Attorneys for Defendant 18 AMERICAN GILSONITE COMPANY 19 Dated: August 31, 2007. LAW OFFICES OF JAMES M. BRADEN 20 21 By: /s/ Pamela J. Sieux 22 Attorneys for Plaintiff 23 PT. UNITED CHEMICALS INTER ANEKA 24 25 26 27 28 STIPULATION RE CONTINUANCE OF

DATES AND [PROPOSED] ORDER

Case No. C 07 2340 JSW

## Caseas: 078: 07-02234203459 VJS VVD 02000 nement 11011 Filled 008//374//20707 Page 144 of 4 **ORDER** PURSUANT TO STIPULATION, IT IS SO ORDERED. Setpe<u>mber 4</u>\_\_\_\_, 2007. Dated: